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SAN BERNARDINO and
CHRISTOPHER ALFRED

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEFFON BARBER, an individual,

Plaintiff,

v.

COUNTY OF SAN BERNARDINO
and CHRISTOPHER ALFRED,

Defendants.

Case No. 5:22-cv-00625-KK-DTB

*[Assigned to the Honorable District
Judge Kenly Kiya Kato, Magistrate
Judge, David T. Bristow]*

**DEFENDANTS' NOTICE OF
ERRATA RE: EXHIBIT A TO
OPPOSITION TO PLAINTIFF'S
MOTION IN LIMINE NO. 1 TO
EXCLUDE EVIDENCE OF,
ARGUMENT REGARDING, OR
REFERENCES TO PLAINTIFF
STEFFON BARBER'S CRIMINAL
RECORD AND PRIOR BAD ACTS;
DECLARATION OF KAYLEIGH
A. ANDERSEN**

Judge: Hon. Kenly Kiya Kato
Date: January 8, 2026
Time: 10:30 a.m.

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

Defendants COUNTY OF SAN BERNARDINO and CHRISTOPHER ALFRED
attached incorrect exhibit A to the Opposition to Plaintiff's Motion in Limine No. 1
to Exclude Evidence of Argument Regarding, or references to Plaintiff Steffon
Barber's Criminal Record and Prior Bad Acts: Declaration of Kayleigh A.

1 Andersen.

2 Attached it the CORRECT exhibit A to the Opposition to Plaintiff's Motion
3 in Limine No. 1 to Exclude Evidence of Argument Regarding, or references to
4 Plaintiff Steffon Barber's Criminal Record and Prior Bad Acts: Declaration of
5 Kayleigh A. Andersen.

6 DATED: December 19, 2025

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

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8
9 By: /s/ Kayleigh A. Andersen
10 Eugene P. Ramirez, Esq.
11 Kayleigh A. Andersen, Esq.
12 Attorneys for Defendants, COUNTY OF
13 SAN BERNARDINO and
14 CHRISTOPHER ALFRED
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EXHIBIT A

EXHIBIT A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

STEFFON BARBER, an)
individual,)
)
Plaintiff,)
)
vs.) Case No.
) 5:22-cv-00625-KK-SHK

COUNTY OF SAN BERNARDINO,)
a municipal entity, and)
DOES 1 THROUGH 10,)
inclusive,)
)
Defendant.)
_____)

REMOTE DEPOSITION OF
STEFFON TODD BARBER
APPEARING REMOTELY VIA ZOOM
SEPTEMBER 9, 2025

Reported by:
F. ELOIS DUNCAN
CSR NO. 4066
Job No. 13309719

1 period talking about before 2014; is that fair?

9:30AM

2 A Yes, ma'am.

3 Q Okay.

4 Other than this current lawsuit, have you ever
5 been a party to a lawsuit before?

9:30AM

6 A No.

7 Q Prior to this incident, have you ever been
8 convicted of a felony?

9 A Yes.

9:31AM

10 Q Okay.

11 How many times?

12 A I can't -- I can't recall. More than once.

13 Q Okay.

14 Do you recall an incident in December of 2017
15 that led to a four-year probation term?

9:31AM

16 MR. DIGGS: Well, objection to the extent it's not a
17 conviction in discussing probation, as it's not
18 admissible.

19 But you can answer if you recall.

20 THE WITNESS: I really don't recall.

9:31AM

21 BY MS. ANDERSEN:

22 Q Do you recall at the time of this incident that
23 you were on felony probation?

24 MR. DIGGS: Same objection; lacks foundation.

25 //

9:31AM

1 BY MS. ANDERSEN:

9:31AM

2 Q You can answer, Mr. Barber.

3 A I can recall being on probation.

4 Q Do you recall pleading guilty to a felony child
5 abuse that led to the four-year probation term?

9:32AM

6 MR. DIGGS: Objection; vague as to scope and time;
7 lacks foundation.

8 You can answer.

9 THE WITNESS: Yeah. Yeah, I do.

9:32AM

10 BY MS. ANDERSEN:

11 Q Okay.

12 Was that on your -- your daughter?

13 A Yes.

14 Q Okay.

15 And that was the probation, the felony probation
16 that you were on at the time of this incident with the
17 deputy; is that correct?

9:32AM

18 A No.

19 Q It wasn't? Was it a different felony probation?

20 A It was a different felony probation.

9:32AM

21 Q Okay.

22 What was that felony probation for that you were
23 on at the time of this incident?

24 A It was an assault, I believe. Assault on an
25 officer if I remember correctly.

9:33AM

1 Q Okay.

9:33AM

2 Do you recall the date of the incident that led
3 to that conviction and probation?

4 A No.

5 Q Okay.

9:33AM

6 Let's see -- how many times had you been
7 arrested by the San Bernardino County Sheriff's Department
8 prior to this incident?

9 MR. DIGGS: Again, objection -- hold on -- hold on.

9:33AM

10 Objection; that's not likely to lead to the admissibility
11 of the evidence to the extent you're just asking about
12 arrest and not felony.

13 But you may answer.

14 THE WITNESS: Too many to remember.

9:33AM

15 BY MS. ANDERSEN:

16 Q Would you say it was more than five times you
17 have been arrested by the San Bernardino County Sheriff's
18 Department prior to this incident?

19 MR. DIGGS: Same objections; calls for speculation.

9:34AM

20 THE WITNESS: It seems like every time they came
21 out, whether I called or the neighbor called -- seems like
22 whenever they were in the area, the neighbor called or
23 anybody called, whenever the police came out, I went to
24 jail for anything. That's what it seems like. I don't
25 know if that's an answer or not.

9:34AM

1 BY MS. ANDERSEN:

9:34AM

2 Q Okay.

3 And do you recall an arrest by the San
4 Bernardino County Sheriff's Department on April 7th of
5 2021? So about 20 days before this incident.

9:35AM

6 MR. DIGGS: Objection; that is not likely to lead to
7 the admissibility of admissible evidence.

8 But go ahead.

9 THE WITNESS: That's what -- that's what I just
10 mentioned. That's what I just mentioned now of the
11 assault.

9:35AM

12 BY MS. ANDERSEN:

13 Q Assault on a deputy; is that correct?

14 A Yes.

15 Q Okay.

9:35AM

16 Do you recall what the terms of your felony
17 probation were at the time you had contact with the deputy
18 on April 27th, 2021?

19 A Can you say that -- can you say the --

20 Q Yeah.

9:35AM

21 Do you recall the terms? Like, the court reads
22 your terms. You have a paper that tells you what your
23 felony conditions are?

24 A The felony conditions, yeah.

25 Q Okay.

9:36AM

1 And do you recall one of them being consent to
2 law enforcement searches?

9:36AM

3 A Yeah, I never refused law enforcement searches.
4 The officer --

5 MR. DIGGS: No, no, no. There's no question,
6 Mr. Barber.

9:36AM

7 BY MS. ANDERSEN:

8 Q Thank you.

9 I am asking specific questions. Just do your
10 best to answer my questions and this process will be a lot
11 smoother so we're not all talking all over each other,
12 okay?

9:36AM

13 A Yeah.

14 Q Okay.

15 As a result of this incident on April 27th of
16 2021, you were found guilty of assault with a deadly
17 weapon by a jury; is that correct?

9:36AM

18 A Can you repeat the question.

19 Q Of course.

20 As a result of this incident on April 27th of
21 2021, the incident we're here to discuss, you were found
22 guilty of assault with a deadly weapon by a jury; correct?

9:36AM

23 A Yes, ma'am.

24 Q Okay.

25 And in that case the deputy, Deputy Alfred, was

9:37AM

1 the victim of the assault; correct?

9:37AM

2 A Yes.

3 Q Was that a yes? I'm sorry.

4 A Yes.

5 Q Okay.

9:37AM

6 And as part of this criminal case arising from
7 the incident, you were also found to be in violation of
8 your probation terms; is that correct?

9 A Yes.

10 Q And that was because you failed to submit to the
11 law enforcement contact; is that correct?

9:37AM

12 MR. DIGGS: Objection; calls for a legal conclusion.

13 THE WITNESS: No. That was because -- because of
14 the assault -- the assault in my terms and conditions, I
15 believe. I never knew it was an officer. So I don't
16 think that violated my terms and conditions. I think they
17 were actually assault --

9:37AM

18 BY MS. ANDERSEN:

19 Q Were you present for the sentencing?

20 A Yes.

9:38AM

21 Q Okay.

22 Do you recall the court during sentencing saying
23 that he, by a preponderance of the evidence, found that
24 you knew Deputy Alfred was a deputy?

25 A No. He said that he -- he believes that I --

9:38AM